

# Cunninghame Scrutiny Group



## Gas and Tenant Safety in Social Housing Scrutiny Report

July 2019





The **Cunninghame Scrutiny Group** would like to **thank** **Cunninghame Housing Association** colleagues and **TIS** for their support in producing this scrutiny review report.

We hope our **recommendations** support the Association to continue to develop its gas safety processes and procedures.



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# Executive Summary

The **Cunninghame Scrutiny Group (CSG)** is delighted to present this scrutiny report on gas safety inspections.

Cunninghame Housing Association (CHA) self-assessed themselves against a Scottish Housing Regulator thematic inquiry on gas and tenant safety. They realised they had no tenant involvement in this area of their service. They approached the scrutiny group who therefore decided to review gas safety practice and procedures.



## This scrutiny task aims included:

- To review how the gas safety inspection process works;
- To identify the key issues affecting access to tenants homes;
- To review the number of properties where forced entries are taking place and that are being capped;
- To identify how the gas safety inspection process can be improved;
- To highlight how communication can be improved.

## A range of methods were used during our scrutiny exercise:

- A review of legislation and current good practice;
- A policy and procedural review;
- Meetings with CHA Housing Staff;
- A review of performance, Annual Return of the Charter (ARC), and satisfaction survey results.

## The review process

Our review of the gas safety inspection process had **two definitive steps** for each exercise carried out:

1. **Summary of key activities**
2. **Findings and positive practice**

Given the nature of this scrutiny task, it was problematic to interview tenants where forced entry/capping was required.

Therefore the majority of evidence gathered for this scrutiny exercise is based on desktop reviews of policy and procedure documents and interviews with CHA staff.



# Key findings

**Key findings** of the scrutiny exercise included:

- CHA promotes a culture centred on tenant safety and full compliance with the requirements on gas safety checks;
- CHA have accurate records of all houses with gas safety checks and a clear position on and procedures for forcing entry;
- CHA keep a record of each safety check for at least 2 years;
- CHA issue a copy of the latest safety check record to tenants within 28 days of the check being completed, or to any new tenant before they move in;
- CHA had 100% of properties with valid gas safety certificates in 2017/18;
- Total number of gas safety checks carried out in 2017-18 was 2399 compared with 2270 in 2016-17;
- CHA had 223 no access for gas servicing from January to December 2018 and this figure is consistent over the last few years;
- As of May 2019, 38 properties were capped;
- CHA does not retain a historical list of reasons for no access/forced entries.
- It would be beneficial to have a greater understanding of the socio economic factors affecting tenants and gaining access to properties.



# Recommendations

The **Cunninghame Scrutiny Group** is delighted to present the following recommendations to review the number of forced access/capped situations.



## Recommendations

1. CHA should seek feedback from tenants to help them to improve their approach to future gas safety management processes.

2. CHA to review all of the correspondence to tenants on the gas safety inspections to ensure that they are in plain English and clear to read, and well signposted to a contact and telephone number for the next steps.

3. CHA to review if there is scope for a more flexible appointment system including evenings and on Saturdays.

4. CHA to seek to benchmark with other Registered Social Landlord's to compare and contract its experience and practice, in terms of gas safety inspection, no access, and capping.

5. CHA to introduce initiatives to seek a greater level of engagement with tenants on debt/ fuel poverty and financial inclusion issues.

6. CHA to gather and review the socio-economic issues affecting tenants and issues affecting no access and forced entry to shape future practice.

7. CHA to record the reasons for no access and forced entry and utilise this information in planning future inspection visits.

8. CHA to monitor and review the number of forced entry/ capped properties and aim to reduce this for 2019-20 and beyond.



# Introduction

CSG was launched in 2015 and we have been working with Cunninghame Housing Association to make a difference to our housing services. We would like to take this opportunity to thank the staff of Cunninghame Housing Association for participating in this worthwhile scrutiny review. **Also to thank Ian Macpherson from Cunninghame Housing Association and Ilene Campbell from TIS who have supported our group throughout this process.** Last but not least, to thank the CSG group members for all their voluntary time and commitment.

We hope that the findings and recommendations from this report will support CHA to further improve the gas safety inspection process.

## Background



CSG was established in 2015 and has up to 8 tenant and owner representatives who independently review Cunninghame's housing services to seek continuous improvement. The **main role** of the Group is:

- To independently review and scrutinise the performance of Cunninghame Housing Association's housing services to support service improvements;
- To commission and review scrutiny activities through an annual work programme and development of actions and improvement plans;
- To make recommendations and report progress on actions to Cunninghame Housing Association's Senior Management Team and Board of Management;
- To report to tenants and other service users on progress being made;
- To review the Tenants' Charter report.

### Our work is based on the following core standards:

1. Being accountable to tenants and service users;
2. Being transparent;
3. Reflecting the needs and aspirations of tenants and service users;
4. Respecting the decision making role of the Board;
5. Making recommendations based on robust evidence.

**TIS** provides our group with specialist, independent advice and training to develop our skills and knowledge to be effective. **Ian Macpherson**, from CHA is the Link Officer ensuring that we have access to the relevant information and CHA colleagues to deliver our scrutiny work. The Link Officer is also responsible for keeping CHA colleagues up-to-date with the group's scrutiny work.



# A review of legislative and good practice

## Summary

As a starting point, CSG reviewed the requirements of the Scottish Social Housing Charter and then the Scottish Housing Regulator (SHR) Gas and Safety in Scottish Social Housing Thematic Study (December 2017).



### Scottish Social Housing Charter Outcome 5: Repairs, maintenance, and improvement

Social landlords manage their businesses so that tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices when work is done.

Landlord annual checks are an important way to help ensure the safety of tenants.

The SHR identified the following key points from its 2017 Thematic Study.

- Gas safety inspections apply to almost 477,000 social rented houses in Scotland;
- Social landlords must maintain gas fittings and flues in tenants' homes in a safe condition and carry out safety checks every year;
- The SHR monitor landlords' performance in these safety checks;
- In 2016/17, 99.89% of housing organisations reported annual gas safety checks completed;
- Social rented landlords should have accurate records of all houses with gas safety checks and a clear position on and procedures for forcing entry and keep a record of each safety check for at least 2 years;
- Social rented landlords should issue a copy of the latest safety check record to tenants within 28 days of the check being completed, or to any new tenant before they move in.





# A review of legislative and good practice

## Findings

- CHA had 100% of properties with valid gas safety certificates in 2017-18;
- Total number of gas safety checks carried out in 2017-18 was 2399 compared with 2270 in 2016-17;
- CHA had 223 no access for gas servicing from January to December 2018 and this figure is consistent over the last few years;
- As of May 2019, 38 properties were capped;
- CHA promotes a culture centred on tenant safety and full compliance with the requirements on gas safety checks;
- CHA have accurate records of all houses with gas safety checks and a clear position on and procedures for forcing entry;
- CHA keep a record of each safety check for at least 2 years;
- In 2017/18, 49 meters were capped and in 2018/19 42 meters were capped. As of May 2019, 38 properties were currently still capped.
- CHA fulfil all their legal requirements in terms of gas safety inspections.
- CHA does not have access to any benchmarking (the comparison of performance and figures from other similar organisations) information other than comparisons with other landlords through the ARC on the percentage of gas supplies with a valid safety certificate. Information on capping is not recorded through the ARC or either of the benchmarking clubs that CHA subscribe to (Housemark and Scotland's Housing Network).



### Comparison with North Ayrshire Council:

	No. of houses	No access	Capped
<b>CHA</b>	2622	223 (9%)	38 (1.5%)
<b>Council</b>	12985	552 (4%)	117 (less than 1%)



# A review of policy and procedures

## Summary

As part of this scrutiny exercise the scrutiny group carried out the following activities:



- Review of CHA Health and Safety Document (Gas safety Installations & Use) Regulations 1998;
- Review of CHA Gas service procedural flow chart;
- Review of Forced Entry Gas Procedure;
- Review of CHA correspondence to tenants;
- Two meetings with CHA staff;
- Feedback from the Housing Director.

## Findings

### Policy and procedure

- CHA promote a culture centred on tenant safety and full compliance with gas safety regulations;
- CHA keep accurate records of houses with gas and of when gas safety checks have been done and keep this updated.



### Communication with tenants

- CHA have clear procedures on gas safety and forced entry and communicate this with tenants;  
  
CHA always give tenants a copy of the gas safety check record and certificate;
- CSG recommend that all correspondence from CHA and the contractor to tenants be reviewed to ensure future correspondence:
  - Is in plain English and easy to understand;
  - Have a contact person and telephone contact number clearly outlined in the body of the letter;
  - Font size is large enough to read (Font size 11 or 12 recommended).



# A review of policy and procedures

## Findings

### No access and forced entries



- CHA make 2 attempts to access tenants homes before they start to escalate their procedures;
- CHA use a range of methods to contact tenants, including hand delivered letters, by phone and by visiting the tenants home;
- CHA ensure hand delivery of forced entry appointment letters;
- CHA does not keep records of the reasons for no access at gas safety checks;
- CHA identified that there are a range of socio economic reasons that contribute to no access and capping. Sometimes it is due to human error, but the majority are due to the following issues;
  - Avoidance due to debt related issues, particularly with the current welfare reform agenda and the roll out of Universal Credit;
  - Mental health issues;
  - Criminal activity, such as meter tampering.
- CHA staff highlighted that sometimes it is not possible to identify the reasons for no access;
- CHA staff identified that there are usually a higher pattern of no accesses in one bedroom properties;
- CHA does not retain a list of reasons for no access/forced entries.
- It would be beneficial to have a greater understanding of the socio economic factors affecting tenants and gaining access to properties;
- The gas safety inspection process is a very staff intensive one;
- Tenants who are having financial difficulties are referred to the Citrus Lemon Aid team within Citrus Energy;
- No access and forced entries have a financial implication and cost to CHA;
- The CHA Board regularly monitors performance regarding gas safety compliance;



# A review of policy and procedures

## Findings



### No access and forced entries (continued)

- Having to arrange and rearrange visits is time consuming for CHA staff, particularly where access is not ultimately gained. Contractor time for forcing access and capping supplies is budgeted at £7,500 per annum;
- All of the administration processing is recorded against the property as are the details of works undertaken to cap the supply. The tenants details are also referred to the Housing Teams and Financial Inclusion Officer to follow up on the fuel supply issue and attempt to have the tenant reconnected;
- No access will initially stem from a general lack of engagement but at the point where entry is taken there are normally associated problems with debt, and tenants are normally self-disconnecting as they cannot afford to use heating systems;
- It is difficult to recommend a strategy for an issue that is largely determined by wider welfare and poverty issues. Referrals to Financial Inclusion support and specialist advisors have some impact in keeping the numbers down. CHA are looking at remotely accessed gas supplies/ heating systems which can be linked to smart meters etc, but this will not address the inability of some tenants to afford fuel, particularly those who are losing benefits through Universal Credit and sanctions.

CSG are concerned about the number of no access and forced entries at gas safety inspections and think this is an area of the service that requires further evidence gathering and monitoring by CHA.

## Thank you

CSG would like to thank CHA colleagues and TIS for their support in producing this scrutiny review report. We hope our recommendations support CHA to continue to develop excellent customer service standards. We look forward to working with CHA to continue to drive forward its housing services.

## Appendix one: CSG Members

Christine Marshall - George McCormick - John Nisbet  
Senga Lawson - Stella Murphy - Willie Clarke



# Recommendations

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## Recommendations

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